

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
ROSINA DENISE COOK	)	Case No. 16-32472-KRH
	)	Chapter 13
Debtor	)	

**MOTION TO EXPEDITE HEARING ON AMENDED  
MOTION TO INCUR DEBT AND TO SHORTEN NOTICE PERIOD**

COMES NOW the Debtor, by counsel, and moves this Court to Expedite the Hearing on her Amended Motion to Incur Debt and to Shorten Notice Period, and in support thereof states as follows:

1. The Debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on May 16, 2010.
2. The Debtor has applied for and Movement Mortgage, LLC has approved a loan to the Debtor in the amount of \$378,826.00 plus interest at 3.625% per annum to be repaid with 360 equal monthly payments of \$2,296.00 for the refinancing of the loan on her home located at 8902 Mansfield Woods Drive, Henrico, VA 23231. The closing costs are to be paid by the Debtor.
3. The refinancing of the loan is in the best interest of the Debtor and will facilitate her ability to perform under her Chapter 13 Plan filed herein.
4. The Debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the Debtor respectfully requests that the Court expedite the hearing on the Amended Motion to Incur Debt, Shorten the Notice Period required for said Motion, and grant such other and further relief as is just and proper.

Dated: May 27, 2020

ROSINA DENISE COOK

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
*Counsel for Debtor*

**CERTIFICATION**

I, James E. Kane, pursuant to Local Rule 9013-1(N), do hereby certify that:

1. I have carefully examined the matter and concluded that there is a true need for an emergency hearing,
2. I have not created the emergency through any lack of due diligence.
3. I have made a *bona fide* effort to resolve the matter without hearing.

By: /s/ James E. Kane  
James E. Kane

**CERTIFICATE OF SERVICE**

I hereby certify that on May 27, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and will mail the same by first class mail, postage pre-paid, to the parties on the attached list.

/s/ James E. Kane  
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
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IN RE:	)	
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ROSINA DENISE COOK	)	Case No. 16-32472-KRH
	)	Chapter 13
Debtor	)	

**NOTICE OF MOTION AND HEARING**

The above Debtor has filed papers with the Court to request an order to Expedite the hearing and to Shorten the Notice Period with respect to the Amended Motion to Incur Debt.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, Virginia 23219

- Attend a hearing scheduled for **June 3, 2020 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: May 27, 2020

ROSINA DENISE COOK

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
1313 East Cary Street  
Richmond, VA 23219  
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/s/ James E. Kane  
Counsel for Debtor

Label Matrix for local noticing  
0422-3

Case 16-32472-KRH

Eastern District of Virginia  
Richmond

Thu Jun 20 16:17:08 EDT 2019

Capital One Auto Finance c/o AIS Portfolio S  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Capital One Auto Finance  
P.O. Box 201347  
Arlington, TX 76006-1347

Capital One Auto Finance c/o AIS Portfolio S  
P.O. BOX 4360  
Houston, TX 77210-4360

Henrico County, Virginia  
HENRICO CONTY  
P.O. BOX 90775  
HENRICO, VA 23273-0775

United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219-1888

AMCA  
P.O. Box 1235  
Elmsford, NY 10523-0935

Account Control Systems, Inc.  
85 Chestnut Ridge Rd.  
Suite 113  
Montvale, NJ 07645-1836

Ashley Funding Services, LLC its successors  
assigns as assignee of Laboratory  
Corporation of America Holdings  
Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

Bon Secours Memorial Regional Med Ctr  
c/o Patrick F. Heinen, Esq.  
Spinella, Owings & Shaia, P.C.  
8550 Mayland Dr.  
Richmond, VA 23294-4704

Bureaus Investment Group Portfolio No 15 LLC  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk VA 23541-1021

Bureaus Investment Group Portfolio No 15 LLC  
c/o Recovery Management Systems Corp  
25 SE 2nd Avenue Suite 1120  
Miami FL 33131-1605

COUNTY OF HENRICO, VIRGINIA  
ANDREW R. NEWBY  
ASSISTANT COUNTY ATTORNEY  
P.O. BOX 90775  
HENRICO, VIRGINIA 23273-0775

Capital One  
Po Box 30285  
Salt Lake City, UT 84130-0285

Capital One Auto Finance  
7933 Preston Rd  
Plano, TX 75024-2302

Capital One Auto Finance, a division of Capi  
4515 N Santa Fe Ave. Dept. APS  
Oklahoma City, OK 73118-7901

Capital One Auto Finance, c/o Ascension Capi  
P.O. Box 201347  
Arlington, TX 76006-1347

Capital One Bank (USA), N.A.  
PO Box 71083  
Charlotte, NC 28272-1083

Comenity Bank/Victoria Secret  
Po Box 18215  
Columbus, OH 43218-0000

Commonwealth of Virginia  
Department of Taxation  
P.O. Box 2156  
Richmond, VA 23218-2156

County of Henrico, VA  
PO Box 90775  
Dept of Finance  
Henrico, VA 23273-0775

Department Store National Bank  
c/o Quantum3 Group LLC  
PO Box 657  
Kirkland, WA 98083-0657

Dr. Overton Wiley Kirchmer  
10410 Ridgfield Pkwy.  
Henrico, VA 23233-3500

ECMC  
PO Box 16408  
St. Paul, MN 55116-0408

(c)ECMC  
3505 HIGHPOINT DR N  
OAKDALE MN 55128-7577

FMS, Inc.  
PO Box 707600  
Tulsa, OK 74170-7600

Firstsource Advantage, LLC  
PO Box 628  
Buffalo, NY 14240-0628

(p)FOCUSED RECOVERY SOLUTIONS  
9701 METROPOLITAN COURT  
STE B  
RICHMOND VA 23236-3690

Ginny's  
c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380-0849

Ginnys/Swiss Colony Inc  
1112 7th Ave  
Monroe, WI 53566-1364

Glasser & Glasser  
580 E. Main St.  
Suite 600  
Norfolk, VA 23510-2322

Henrico Area Mental Health  
10299 Woodman Rd.  
Glen Allen, VA 23060-4419

IC Systems, Inc  
444 Highway 96 East  
Po Box 64378  
St Paul, MN 55164-0378

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

MCV HOSPITAL  
P O BOX 980462  
RICHMOND, VA 23298-0462

MCV Physicians  
PO Box 91747  
Richmond, VA 23291-9747

MIDLAND FUNDING LLC  
PO Box 2011  
Warren, MI 48090-2011

Midland Funding  
2365 Northside Dr  
Suite 300  
San Diego, CA 92108-2709

POM Recoveries  
PO Box 602  
Lindenhurst, NY 11757-0602

Pediatric Center  
10571 Telegraph Rd.  
Suite 110  
Glen Allen, VA 23059-4652

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

Professional Bureau of Collect  
P.O. Box 4157  
Englewood, CO 80155-4157

Receivables Performance Mgmt  
Attn: Bankruptcy  
Po Box 1548  
Lynnwood, WA 98046-1548

Synchrony Bank/PayPal Cr  
Attn: Bankruptcy  
Po Box 103104  
Roswell, GA 30076-9104

Synchrony Bank/Walmart  
Attn: Bankruptcy  
Po Box 103104  
Roswell, GA 30076-9104

TD Bank USA, N.A.  
C O WEINSTEIN & RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121-3132

Target  
C/O Financial & Retail Services  
Mailstop BT PO Box 9475  
Minneapolis, MN 55440-9475

The Bureaus Inc.  
650 Dundee Rd  
Ste 370  
Northbrook, IL 60062-2757

Virginia Department of Tax  
P.O. Box 1115  
Richmond, VA 23218-1115

Visa Dept Store National Bank  
Attn: Bankruptcy  
Po Box 8053  
Mason, OH 45040-8053

Wells Fargo Auto  
Po Box 29704  
Phoenix, AZ 85038-9704

Wells Fargo Bank, N.A. - Wells Fargo Auto Fi  
PO Box 29706  
Phoenix, AZ 85038-9706

James E. Kane  
Kane & Papa, PC  
1313 East Cary Street  
P.O. Box 508  
Richmond, VA 23218-0508

Rosina Denise Cook  
6464 Springcrest Lane  
Henrico, VA 23231-5324

Suzanne E. Wade  
P.O. Box 1780  
Richmond, VA 23218-1780



Focused Recovery Solutions  
9701-Metropolitan Ct  
Ste B  
Richmond, VA 23236-0000

Internal Revenue Service  
Kansas City, MO 64999-0002

Portfolio Recovery  
Attn: Bankruptcy  
Po Box 41067  
Norfolk, VA 23541-0000

(d)Portfolio Recovery Associates, LLC  
POB 41067  
Norfolk VA 23541

Addresses marked (c) above for the following entity/entities were corrected  
as required by the USPS Locatable Address Conversion System (LACS).

Ecmc  
1 Imation Place  
Bldg 2  
Oakdale, MN 55128-0000

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Wellsfargo bank n.a.

End of Label Matrix	
Mailable recipients	55
Bypassed recipients	1
Total	56